

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

Terves LLC, )  
Plaintiff, ) Case No. 1:19-cv-1611  
vs. )  
Yueyang Aerospace New Materials Co., ) JUDGE DONALD C. NUGENT  
Ltd., )  
and )  
Ecometal Inc., )  
and )  
Nick Yuan, )  
Defendants. )

Defendants Ecometal Inc. and Nick Yuan, through their undersigned counsel, hereby move pursuant to Fed. R. Civ. P. 6(b) for (1) an extension of time of up to seven (7) days, to and including September 11, 2019, to move to dismiss the Complaint pursuant to Fed. R. Civ. P. 12(b)(4)-(5) for insufficient process and/or insufficient service of process; and (2) an extension of time of up to thirty (30) days, to and including October 4, 2019, within which to answer or otherwise respond, excluding raising the aforementioned defenses under Fed. R. Civ. P. 12(b)(4)-(5), to the Complaint. This is Defendants' first request for an extension of time. As more fully set out in Defendants' Memorandum in support of this motion, good cause exists for the extension of time

sought in this Motion. Defendants' counsel contacted counsel for Plaintiff Terves LLC, who indicated that Terves LLC does not oppose this motion.

Dated: September 3, 2019.

Respectfully submitted,

/s/ Steven J. Forbes

Steven J. Forbes (0042410)

**NORCHI FORBES LLC**

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-and-

Evan W. Talley, OBA # 22923 (*pro hac vice* application forthcoming)

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**ATTORNEYS FOR DEFENDANTS  
ECOMETAL INC. AND NICK YUAN**

**CERTIFICATE OF SERVICE**

I certify that on September 3, 2019, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF system for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Matthew J. Cavanaugh

David B. Cupar

*/s/ Steven J. Forbes*

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One of the Attorneys for Defendants  
Ecometal Inc. and Nick Yuan